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**UNITED STATES DISTRICT COURT
CLARK COUNTY, NEVADA**

T1 PAYMENTS LLC, a Nevada limited liability
company,
Plaintiff,

vs.

NEW U LIFE CORPORATION, a California
corporation,
Defendant.

NEW U LIFE CORPORATION, a California
corporation,
Counterclaimant,

vs.

T1 PAYMENTS LLC, et al.,
Counterclaim-Defendants.

Case No.: 2:19-cv-01816-ART-DJA

**JOINT STIPULATION TO SET
BRIEFING SCHEDULE TO RESPOND
TO NEW U LIFE CORP.'S SECOND
AMENDED COUNTERCLAIM
(Second Request)**

Pursuant to Fed. R. Civ. P. 16(b)(4) and LR IA 6-1 and LR 26-3, plaintiff and counterclaim-defendant T1 Payments LLC, counterclaim-defendants T1 Payments Ltd., TGlobal Services Ltd., Donald Kasdon, Amber Fairchild, and Debra King (collectively, “Appeared Counterclaim-Defendants”), TGlobal Services LLC, and Pixxles LLC (collectively, “New Counterclaim-Defendants”), and defendant and counterclaimant New U Life Corp. (collectively, “Moving Parties”) jointly request that the Court extend the deadlines set forth by the Court’s Order of February 3, 2022 (ECF No. 200) as follows:

- That the Appeared Counterclaim-Defendants’ deadline to file a response to New U Life’s Second Amended counterclaim (ECF No. 215, “SACC”) be extended from June 13, 2022 to June 30, 2022;
- That TGlobal Services LLC’s and Pixxles LLC’s deadline to file a response to New U Life’s SACC be extended from June 22, 2022 to June 30, 2022;
- That Pixxles Ltd.’s deadline to file a response to New U Life’s SACC shall be August 1, 2022;
- That New U Life’s opposition to the Appeared Counterclaim-Defendants and TGlobal Services LLC’s and Pixxles LLC’s forthcoming motions to dismiss be extended from 14 days to July 21, 2022; and
- That the Appeared Counterclaim-Defendants and TGlobal Services LLC’s and Pixxles LLC’s replies in support of their respective motions to dismiss be extended from 7 days to August 4, 2022.

I. PROCEDURAL BACKGROUND

On February 1, 2022, the parties submitted a joint stipulation proposing that counterclaim-defendants be given 30 days to respond to New U Life’s then-forthcoming SACC. (ECF No. 199.) The Court granted this extension on February 3, 2022. (ECF No. 200.) On May 12, 2022, New U Life filed its SACC (ECF No. 215), which set the deadline for the Appeared Counterclaim-Defendants to respond to June 13, 2022. The SACC is 321 paragraphs and added three new parties (TGlobal Services LLC, Pixxles LLC, and Pixxles Ltd.). (Id.) TGlobal Services LLC and Pixxles LLC were served with the SACC on June 1, 2022, setting their deadline to respond as June 22, 2022.

1 In exchange for agreeing to the extensions of time to respond to the SACC set forth above, counsel
2 for the Appeared Counterclaim Defendants agreed to accept a waiver of service on behalf of Pixxles
3 Ltd., and the Moving Parties agreed that Pixxles Ltd.'s response to the SACC will be due 60 days
4 from the date the waiver was sent which is August 1, 2022.

5 **II. GOOD CAUSE EXISTS TO MODIFY THE SCHEDULE**

6 Good cause exists to extend the deadlines set forth by the Court's Order of February 3, 2022
7 (ECF No. 200) related to the SACC. The requested extension will assist the Moving Parties to attend
8 to the outstanding motions yet to be fully briefed. The requested extension will also assist the
9 Appeared Counterclaim-Defendants and the New Counterclaim-Defendants to respond to the SACC
10 in a fulsome manner, given that the SACC contained an additional 100 paragraphs of allegations
11 from the first amended counterclaim (ECF No. 85) and added three new parties. Further, the
12 requested extension will also consolidate deadlines, which will help to streamline the Court's docket
13 as much as possible.

14 The Moving Parties agree that the proposed schedule adequately addresses these concerns
15 and is in the best interest of all parties and judicial efficiency. This request is not made for the
16 purposes of delay. Accordingly, and for good cause shown, the Moving Parties respectfully request
17 that the Court grant the requested extensions of dates.

18 None of the Moving Parties waive any rights or defenses by entering into this stipulation
19 other than to modify the briefing deadlines set forth herein.

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21 [Signature blocks on following page]
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1 Dated this 8th day of June, 2022.

2 McDONALD CARANO, LLP

3
4 By: /s/ Aaron D. Shipley
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18 ROME & ASSOCIATES, A.P.C.
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19 *Attorneys for New U Life Corporation*

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21 IT IS SO ORDERED:

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23 _____
24 DANIEL J. ALBREGTS
25 UNITED STATES MAGISTRATE JUDGE
26 DATED: June 9, 2022
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CERTIFICATE OF SERVICE

I certify that I am an employee of McDonald Carano LLP, and that on the 8th day of June, 2022, a true and correct copy of the foregoing **JOINT STIPULATION TO SET BRIEFING SCHEDULE TO RESPOND TO NEW U LIFE CORP.'S SECOND AMENDED COUNTERCLAIM (Second Request)** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

/s/ Leah Jennings

An employee of McDonald Carano LLP